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AGENDA

OU 7 IM/IRA/EA DD Project Team

Wednesday, March 15, 1995
Small West Conference Room
10:00 AM

1. OU 7 Conceptual Site Model (What portions are presumptive?)
 - Presumptive Remedy
 - Preventing direct contact with landfill contents
 - Minimizing infiltration and resulting contamination leaching to groundwater
 - Controlling surface water runoff and erosion
 - Collecting and treating contaminated ground water and leachate to contain the contaminant plume and prevent further migration from source area
 - Controlling and treating landfill gas
 - Non-Presumptive Remedy
 - Remediating groundwater
 - Remediating contaminated surface water and sediment
 - Remediating contaminated wetland areas
2. Other Presumptive Remedy confusing descriptions (roundtable discussion)
 - Groundwater Control and Treatment vs. Groundwater Remediation
 - Screening Level Risk Assessment vs. Focused Risk Assessment
 - Innovative technology should be considered when such technology offers the potential for comparable or superior treatment performance and implementability, fewer or lesser adverse impacts than other available approaches or lower costs of similar levels of performance than demonstrated technologies

Next meetings: March 22, 1995, 10:00, Interlocken-Small West Conference Room
TOPICS: ARARs, treatment standards

Agency Interface Meeting - TBD

Please note: The April 6, 1995 meeting will be held at Stoller in Boulder.

ADMIN RECORD

BZ-A-000415

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March 21, 1995
2510-95/34

Ms. Laurie Peterson-Wright
EG&G Rocky Flats, Inc.
P.O. Box 464, Bldg. 080
Golden, Colorado 80402-0464

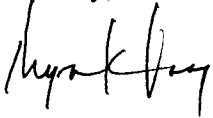
Subject: Submittal of March 15, 1995 Meeting Minutes
Technical Working Group Meeting for Operable Unit No. 7
(MTS Contract 353017TB3)

Dear Ms. Peterson-Wright:

Enclosed are meeting minutes to document the March 15, 1995, technical working group meeting for the OU 7 landfill closure interim measure/interim remedial action and environmental assessment.

If you have any questions, please contact me at your convenience.

Sincerely,



Myra K. Vaag
Project Manager

Enclosure

cc:	W. Bartholomew w/o	EG&G	B. Caruso	Stoller
	R. Cygnarowicz	EG&G	A. Crockett	Stoller
	T. Lindsay	EG&G	M. Eisenbeis	Stoller
	P. Martin	EG&G	K. Fiebeg	Stoller
	P. Corser	TerraMatrix	S. Franklin	Stoller
	J. Kendall	TerraMatrix	C. Gee	Stoller
			J. Jankousky	Stoller
			D. Palmer	Stoller
			L. Ross w/o	Stoller
			B. Stephanus w/o	Stoller
			OU7 Project File	
			MKV Chron	

2

Minutes for the OU 7 Seep Collection/Landfill Closure IM/IRA
Technical Working Group Meeting
March 15, 1995

The following topics were discussed:

OU 7 Conceptual Site Model (What portions fall under presumptive remedy?)

The general conceptual site model for landfills for use in risk assessments, included in the EPA guidance for presumptive remedy, shows contaminant release mechanisms, affected media, exposure routes, and receptors. Stoller will make this diagram into an overhead for the agency meeting. Affected media correspond to the components of the landfill closure IM/IRA/EA for OU 7. Working group members discussed the components of the landfill closure IM/IRA/EA and came to terms with which components fall under the presumptive remedy and which components do not. The presumptive remedy includes the following:

- Preventing direct contact with the landfill contents
- Minimizing infiltration and resulting contaminant leaching to groundwater
- Controlling surface water runoff and erosion
- Controlling groundwater and leachate to contain the plume and prevent migration from the source area
- Controlling and treating landfill gas, if necessary

Non-presumptive remedy components, which are outside the source area, include the following:

- Remediating groundwater, if necessary
- Remediating contaminated surface water and sediment, if necessary
- Remediating contaminated surface soils, if necessary
- Remediating contaminated wetland areas, if necessary

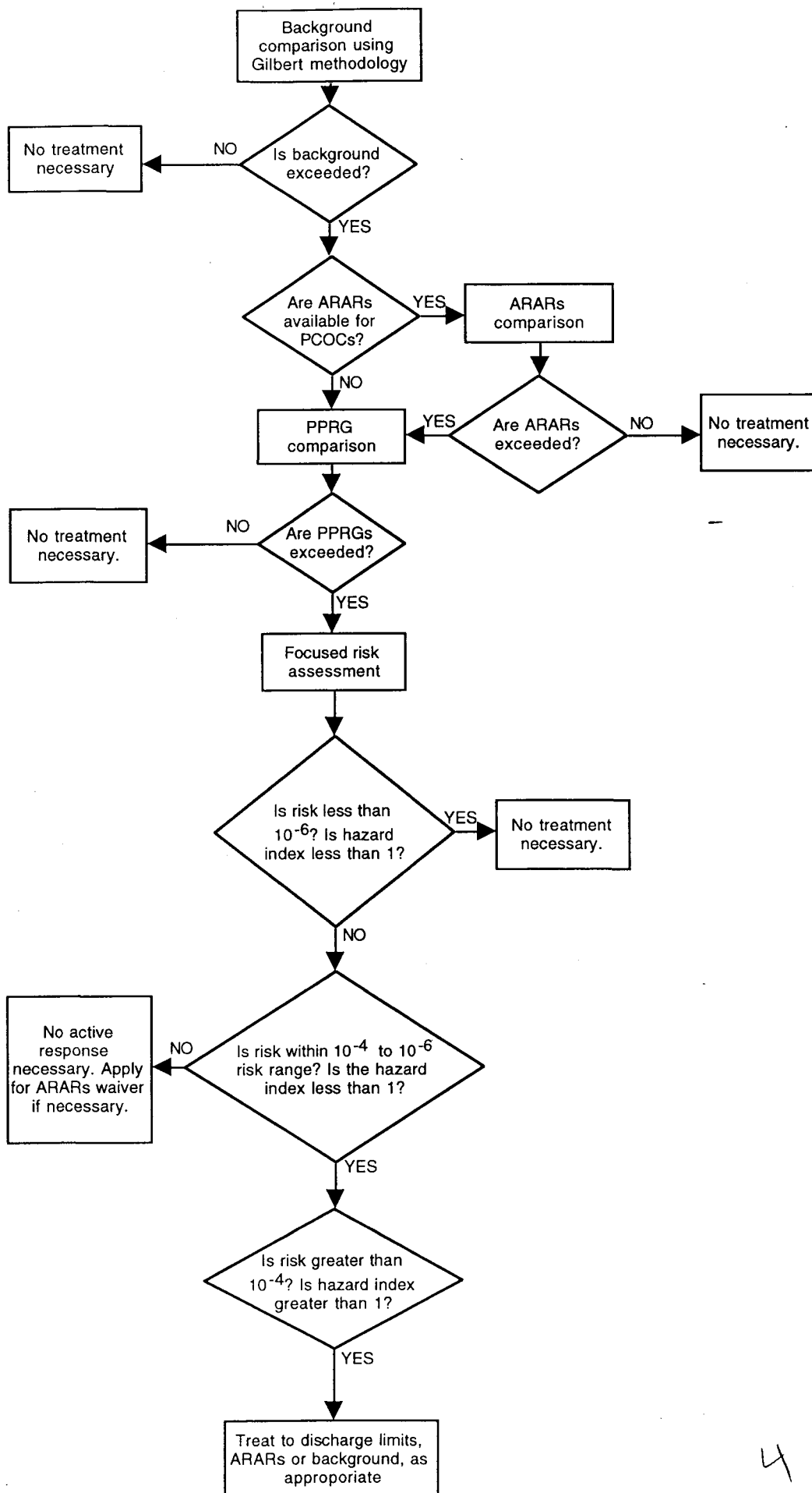
Additional data evaluation, statistical comparisons of site concentrations against background concentrations, ARARs comparisons, PPRG comparisons, and a focused risk assessment will be used to determine if remediation of these media is necessary and appropriate. Two separate populations of groundwater data will be used for treatment determination; the wells around the pond and the wells below the dam. The flow chart for treatment determination, developed in the meeting last week, will be used for all non-presumptive remedy media to provide a consistent approach. Several changes were made to the flow chart in the decision regarding risk (see attached). If risk is less than 10^{-6} and/or the hazard index is less than 1 no treatment is necessary. If risk is within the 10^{-4} to 10^{-6} risk range and/or the hazard index is less than 1 no active response is necessary because the landfill is no longer acting as a source of contamination. If the risk is greater than 10^{-4} and/or the hazard index is greater than 1 treatment is required.

The fate of the East Landfill Pond was also discussed. If the pond water is delisted under CERCLA, the water would not have to be managed under RCRA. The water would then be regulated under the Clean Water Act, an NPDES permit would be required, and Segment 5 standards would apply. If the pond remains and is used for treatment it would be regulated under RCRA, which would require inspections, a double liner, and leak detection. Built-in redundancies may be required in any case.

Clarification of Other Presumptive Remedy Issues

EPA guidance on presumptive remedies is unclear regarding the difference between groundwater control and treatment under the presumptive remedy and groundwater remediation under non-presumptive components of the remedy. Because the landfill at OU 7 is located within a drainage, groundwater control

Treatment Determination for Non-Presumptive Remedy Media



and treatment under the presumptive remedy is generally limited to upgradient groundwater control. Groundwater remediation as a component of the non-presumptive remedy will address all groundwater as it migrates away from the source; treatment will be performed if necessary.

Presumptive remedy guidance is also unclear regarding the difference between a screening-level risk assessment and a focused risk assessment. The group concurred that an ARARs comparison will be used for a screening-level risk assessment. The process described by the flow chart for treatment determination will be used for the focused risk assessment. EG&G risk assessment staff will be consulted to determine the appropriate scenario (residential, ecological researcher, etc.) for each media.

Innovative technology should be considered when such technology offers potential for comparable or superior treatment performance and implementability, fewer impacts or less-adverse impacts than other available approaches, or lower costs of similar levels of performance than demonstrated technologies. This provides the opportunity to explore the use of passive treatment systems.

Action Items

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| 01-186 | Completed. |
| 187 | Determine if a small French drain would decrease head buildup in groundwater west of the landfill using the existing groundwater model (J. Jankousky, Stoller). In progress. |
| 188-201 | Completed. |
| 202 | Research implications of extending the IHSS 114 boundary to include all of OU 7 (L. Peterson-Wright, EG&G). In progress. |
| 203-204 | Completed. |
| 205 | Perform a risk assessment on groundwater downgradient of the dam (K. Crute, Stoller). A preliminary risk assessment was performed. Based on comments from the EG&G risk assessment staff, Stoller will redo the background comparisons using the Gilbert methodology and use a 95% upper confidence limit (UCL) for the focused risk assessment. In progress. |
| 206 | Conduct an ecological benchmark screen (M. Vaag, Stoller). Stoller has the resources necessary to perform the screen. In progress. |
| 207 | Compile a list of ARARs for groundwater (S. Franklin, Stoller). The list of ARARs has been compiled. Completed. |
| 208 | Assist EG&G in preparing the OU 7 closure strategy paper for the next agency meeting (M. Vaag, Stoller). In progress. |
| 209 | Prepare written responses to EPA's comments on the OU 7 Landfill Closure IM/IRA update meeting, and submit them to EG&G by March 22 (M. Eisenbeis, Stoller). Responses have been completed and will be submitted on March 22. Completed. |

Next Meeting

The next meeting will be at 10:00 a.m. on March 22, 1995, in the EG&G small west conference room. Topics of discussion will include ARARs and treatment standards.

List of Attendees

Name	Organization	Phone
Mary Eisenbeis	Stoller	546-4474
Tom Lindsay	EG&G	966-6985
Peter Martin	EG&G	966-8695
Laurie Peterson-Wright	EG&G Project Manager	966-8553
Myra Vaag	Stoller Project Manager	546-4417